

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff.

v.

Case: 2:15-cr-20094  
Judge: Battani, Marianne O.  
MJ: Stafford, Elizabeth A.  
Filed: 02-19-2015 At 03:58 PM  
INDI USA V. SEALED MATTER (DA)

D-1 ANGELA PATTON  
D-2 SAM OSCAR PATTON  
D-3 DONTEZ PATTON  
D-4 JOHNATHON WESTON  
D-5 CHARLIE SMITH  
D-6 THOMAS TURNER, SR.  
D-7 ARAMONA COLEMAN  
D-8 TYNEKWA HILL  
D-9 JEFFREY MORTON  
D-10 VERDELL KENNEDY  
D-11 RAYMOND THOMAS,

Defendants.

/

INDICTMENT

THE GRAND JURY CHARGES:

GENERAL ALLEGATIONS

Definitions

- At all times pertinent to this Indictment:
1. **Personal Identifying Information (PII)** includes all means of identification which may be used alone or with other information to identify a specific individual, such as a name, birth date, social security number, address, credit

card account number, or a driver's license number, as well as any other unique personal identifying information.

2. **Access device** means any card, account number, personal identification number, or other means of account access which can be used, alone or in conjunction with another access device, to obtain money, goods, services or other things of value, or can be used to initiate a transfer of funds.
3. **Counterfeit access device** means any access device that is counterfeit, fictitious, altered or forged.
4. **Counterfeit credit cards** appear to be genuine, but were manufactured without the authority of the credit issuing bank. Counterfeit credit cards may contain the actual account numbers of unwitting victims that were obtained by fraud.
5. **Counterfeit driver's licenses** appear to be genuine, but were not issued by or with the authority of the Secretary of State or any other government agency.
6. **Blue Cross Blue Shield of Michigan (BCBSM)** is a nonprofit mutual insurance company. BCBSM is an independent licensee of the Blue Cross and Blue Shield Association (BCBSA). BCBSM provides and administers health benefits to more than 4.4 million members residing in Michigan in addition to employees of Michigan-headquartered companies who reside

outside the state. **Blue Care Network of Michigan (BCNM)** is a nonprofit health maintenance organization, owned by BCBSM.

7. **BCBSM administers health plans**, as defined by 42 U.S.C. § 1320d-1, and was and is a covered entity subject to federal regulations designed to protect individually identifiable health information of patients, said regulations being promulgated by the Secretary of Health and Human Services at 45 CFR 45 CFR 160, 162, and 164, under the authority of Section 264 of the Health Insurance Portability and Accountability Act of 1996, Pub.L. 104-191 (codified at 42 U.S.C. § 1320d-2 note) (hereinafter, the “**HIPAA Regulations**”).
8. **National Accounts Service Company (NASCO)** is a company based in Atlanta, Georgia which provides information technology solutions to BCBS plans across the nation. NASCO’s single-system solution is designed to ensure that plan members’ insurance claims are paid accurately and efficiently.
9. **NASCO Customer Service Workstation (NCSW)** is a computer application which enables users to research and document eligibility, benefits, claims, payment information, maximums, coordination of benefits and provider data in response to inquiries from subscribers and providers. NCSW pulls eligibility, claims and provider information from NASCO

Mainframe (NPS). NASCO's mainframe NPS is located in Lexington, Kentucky.

10. **A BCBSM Customer Service Representative (CSR) analyzes, evaluates, resolves and responds to customer/provider inquiries received via telephone, correspondence, or in person involving a variety of claim/benefit issues under various product lines.**
11. **Accessing Records:** When NCSW is used by a CSR working in a BCBSM office in Michigan, a connection is established with a BCBSM server and sent to NPS (located in Lexington, Kentucky) through BluesNet. BluesNet is owned by BCBSA and is the communications channel used by BCBS Plans to transmit transactions amongst each other as well as NASCO.
12. When a CSR accesses a record of a subscriber/member in NASCO, the CSR uses NCSW as its application. The application connects to a server in Detroit, Michigan, which connects to BluesNet. BluesNet routes the information to the NASCO Data Center in Lexington, Kentucky.
13. Each CSR has a unique user name and password to access the NASCO data.
14. From approximately July 2001 to approximately June 2013, ANGELA PATTON (D-1) was employed by BCBSM as a CSR working in their Detroit, Michigan offices.

15. As a CSR working for BCBSM, ANGELA PATTON (D-1) had access to their computer system and databases and had received training in and became familiar with her obligations of confidentiality under the HIPAA Regulations, and was thus authorized by BCBSM to access individually identifiable health information of patients who received health coverage from health plans administered by BCBSM, for only such purposes as permitted by the HIPAA Regulations.

**The Scheme**

16. Beginning in or about January 2012, and continuing through in or about December 2014, in the Eastern District of Michigan, Southern Division and elsewhere, ANGELA PATTON (D-1) had an agreement with persons known and unknown to the Grand Jury whereby she received payments in exchange for obtaining and disclosing individually identifiable health information (PII) of patients covered by health plans administered by BCBSM for purposes not authorized by the HIPAA Regulations. The fraudulently obtained PII was intended to be used in identity theft and credit theft of individual BCBSM subscribers.
17. SAM PATTON (D-2) recruited Michigan residents such as DONTEZ PATTON (D-3), JOHNATHON WESTON (D-4), CHARLIE SMITH (D-5), THOMAS TURNER, SR. (D-6), ARAMONA COLEMAN (D-7), and

TYNEKWA HILL (D-8) and provided them with counterfeit Michigan identifications in the names of BCBSM subscribers whose PII were printed without authorization by ANGELA PATTON (D-1). SAM PATTON (D-2) also provided them with counterfeit credit cards and credit reports in these same names and instructed them to travel to different states in order to use these false identifications and credit cards to purchase merchandise (later shipped to him in Michigan) and to apply for credit lines in the victims' names at major stores such as Lowe's, Cabela's, and others.

#### The Texas Search

18. On May 20, 2013, Irving Police Department in Irving, Texas conducted a consent search at a local hotel. Present in the room were ARAMONA COLEMAN (D-7), THOMAS TURNER, SR. (D-6), and TYNEKWA HILL (D-8). During that search, police found several BCBSM screen shots containing the PII of BCBSM subscribers from Michigan, and four Transunion credit reports matching individuals from the BCBSM screen shots. The credit reports were in the names of: D.B. from Southfield, MI, J.C. from West Olive, MI, J.I. from Williamston, MI, and P.S. from Grand Haven, MI.
19. The BCBSM screen shots found by Irving police contain hand written notes listing major stores and dollar amounts. The store names match stores where

the victims had opened charge accounts according to their credit report, and the dollar amounts correspond to the credit limits with the stores. For example, the screen shot with victim D.B.'s information contains the following handwritten notes: "Macy \$2000", "Sears \$10,000", "JCP \$1,000", and "Kohls \$1,500." This information matched D.B.'s credit report recovered by the police.

20. Additionally, the Irving police found six fraudulent Michigan driver's licenses with the photo of TURNER (D-6) using biographical information from BCBSM subscribers, including J.I. and P.S.. Also recovered was a Michigan driver's license with the photo of COLEMAN (D-7) using the biographical information of a BCBSM client J.C.. Five temporary Lowe's credit cards in the names of BCBSM subscribers were also located in the room during that search.
21. All the screen shots, false identifications, credit cards, and credit reports recovered in Irving, TX include PII belonging to Michigan victims who were BCBSM subscribers. Two of the screen shots include parts of a worksheet authored by ANGELA PATTON (D-1) and stored on her computer, including her notes. Further, one of the screen shots was documented by internal controls at BCBSM which randomly capture screen shots to audit its employees' work. The screen capture was from

PATTON's computer and took place on May 2, 2013 at 3:34 pm and it showed PATTON's log notes. The same notes were visible on the screen shot recovered in Irving. Analysis of PATTON's print screen requests on May 2, 2013 shows that she conducted twenty screen prints between 3:25 pm and 3:33 pm.

#### **The Ohio Search**

22. On July 7, 2013, Ohio State Highway Patrol conducted a traffic stop in Troy on a Chevy Impala with a Michigan license plate. The vehicle was driven by JOHNATHON WESTON (D-4), with DONTEZ PATTON (D-3) in the front passenger seat, and CHARLIE SMITH (D-5) in the back seat. Troopers recovered from the vehicle's glove box five BCBSM screen shots containing the PII of BCBSM subscribers from Michigan. They also seized five fraudulent Michigan driver's licenses with the photo of SMITH (D-5) using biographical information for subscribers from the five BCBSM screen shots. Troopers also recovered four credit cards embossed with the names of individuals from the screen shots and an Experian credit report for an individual matching one of the names in the screen shots.
23. In addition to subscribers' PII, the five screen shots included parts of a worksheet authored by ANGELA PATTON (D-1) and stored on her computer, including her notes. These screen shots also contained hand

written notes listing major stores and dollar amounts, in what appears to be a reference to victims' store charge accounts and their corresponding credit limits.

**The Michigan Searches**

24. On December 22, 2013, police in Livonia, Michigan, arrested DONTEZ PATTON (D-3) for retail fraud. During a subsequent search, they found him in possession of two screen shots containing PII for BCBSM subscribers. Police also recovered from JONATHON WESTON (D-4), who was driving the car in which PATTON (D-3) was a passenger, two credit card writers. In addition to subscribers' PII, the two screen shots included parts of a worksheet authored by ANGELA PATTON (D-1) and stored on her computer, including her notes.
25. On August 22, 2014, during the execution of a search warrant at the residence of RAYMOND THOMAS (D-11) in Oak Park, Michigan, agents recovered several counterfeit identifications with other people's names and THOMAS's picture, as well as fraudulently obtained Sam's Club membership cards with THOMAS's picture and Cabela's cards in the names of other people. They also recovered two screen shots which included PII of BCBSM subscribers. One of the screen shots also included notes from ANGELA PATTON's worksheet. One of the counterfeit identification and

the corresponding Sam's Club card were in the name of D.M., a BCBSM subscriber.

26. On December 16, 2014, during the execution of a search warrant at the apartment of RAYMOND THOMAS (D-11) in Southfield, Michigan, agents recovered a fraudulently obtained Sam's Club membership card with THOMAS's picture in the name of T.T., a BCBSM subscriber. They also recovered BCNM screen shots which included PII for over 1,000 subscribers and 66 screen shots which included PII of BCBSM subscribers as well as notes from ANGELA PATTON's worksheet.
27. On August 22, 2014, during the execution of a search warrant at the residence of VERDELL KENNEDY (D-10) in Detroit, Michigan, agents recovered several counterfeit identifications with victims' names and KENNEDY's picture, as well as fraudulently re-encoded credit cards with the names of the corresponding counterfeit identifications. Additionally, agents recovered a photograph showing RAYMOND THOMAS, VERDELL KENNEDY, and JEFFREY MORTON together. They also recovered a credit report in the name of C.C., a BCBSM subscriber.
28. On December 16, 2014, during the execution of a search warrant at the residence of JEFFRY MORTON (D-9) in Southfield, Michigan, agents recovered several counterfeit identifications with victims' names and

MORTON's picture, as well as thousands of BCNM screen shots containing victims' PII. One of the counterfeit identifications found was in the name of D.M., a BCBSM subscriber.

**COUNT ONE**

*(18 U.S.C. §1349 – Conspiracy to Commit Wire Fraud)*

D-1 ANGELA PATTON  
D-2 SAM OSCAR PATTON  
D-3 DONTEZ PATTON  
D-4 JOHNATHON WESTON  
D-5 CHARLIE SMITH  
D-6 THOMAS TURNER, SR.  
D-7 ARAMONA COLEMAN  
D-8 TYNEKWA HILL  
D-9 JEFFREY MORTON  
D-10 VERDELL KENNEDY  
D-11 RAYMOND THOMAS

29. The General Allegations contained in paragraphs 1 through 28 are incorporated into this count by reference.
30. From January 2012 through December 2014, those dates being approximate, in the Eastern District of Michigan, Southern Division and elsewhere, ANGELA PATTON (D-1), SAM OSCAR PATTON (D-2), DONTEZ PATTON (D-3), JOHNATHON WESTON (D-4), CHARLIE SMITH (D-5), THOMAS TURNER, SR. (D-6), ARAMONA COLEMAN (D-7), TYNEKWA HILL (D-8), JEFFREY MORTON (D-9), VERDELL KENNEDY (D-10), and RAYMOND THOMAS (D-11) did knowingly, willfully and unlawfully combine, conspire and agree with each other and

with others known and unknown to the Grand Jury to commit Wire Fraud, in violation of 18 U.S.C. § 1343.

31. ANGELA PATTON (D-1) and her co-conspirators devised and executed a scheme to defraud and to obtain money and property by means of material false and fraudulent pretenses, representations and promises.
32. In furtherance of the scheme and to accomplish its goals, the conspirators used the PII of unwitting victims, obtained without authority by PATTON (D-1) through her work at BCBSM, to apply for credit lines in the names of these victims at different major stores throughout the United States and fraudulently purchase merchandise from these stores. The conspirators also created counterfeit identification and credit cards in the names of these victims and used them at different stores throughout the United States, causing the use of interstate wire transmissions.
33. ANGELA PATTON's duties as a CSR at BCBSM required her to access BCBSM's computer database maintained by NASCO and view Eligibility Screens pertaining to individuals insured through BCBSM. These Screens contained insured customers' profiles, including customers' PII such as: name, birth date, address, social security number, subscriber identification, etc. PATTON (D-1) however exceeded the authority provided by her employer and accessed hundreds of customers' profiles beyond what was

required to perform her assigned tasks. Further, and without any authority, PATTON (D-1) printed the screens containing customers' PII and provided them to other individual(s) in exchange for money. PATTON (D-1) knew that these PII would be used to commit wire fraud and other identity and credit theft related crimes. During the month of May 2013 alone, PATTON printed 934 NASCO screen shots from her work computer with information pertaining to approximately many more BCBSM's subscribers while her normal work load required her to print less than 100 such screens in one month. At least 85 BCBSM screen shots, with PII belonging to approximately 381 victims, were recovered from ANGELA and SAM PATTON's co-conspirators by law enforcement in different states, of which 61 were positively linked to ANGELA PATTON (D-1) by her unique work sheet information and notes found on each screen shot.

34. All in violation of Title 18, United States Code, Section 1349.

**COUNT TWO**

*(42 U.S.C. §1320d-6 – Wrongful Disclosure of Health Information)*

D-1 ANGELA PATTON

35. The allegations in paragraphs 1 through 33 are incorporated into this count by reference.
36. Beginning in or about January 2012, and continuing through in or about June 2013, in the Eastern District of Michigan, Southern Division, ANGELA

PATTON (D-1), then an employee of BCBSM, knowingly and for a purpose other than permitted by the HIPAA Regulations, obtained and caused to be obtained individually identifiable health information relating to multiple individuals, with the intent to sell, transfer, and use said information for commercial advantage, personal gain, and malicious harm.

37. All in violation of Title 42, United States Code, Section 1320d-6(a)(2), (a)(3), and b(3).

**COUNT THREE**

*(18 U.S.C. §§ 1028(a)(7) and 2 – Identity Theft, Aiding and Abetting)*

D-1 ANGELA PATTON  
D-2 SAM OSCAR PATTON  
D-3 DONTEZ PATTON  
D-4 JOHNATHON WESTON  
D-5 CHARLIE SMITH  
D-6 THOMAS TURNER, SR.  
D-7 ARAMONA COLEMAN  
D-8 TYNEKWA HILL

38. The allegations in paragraphs 1 through 33 are incorporated into this count by reference.
39. From in or about January 2012, and continuing through in or about December 2013, in the Eastern District of Michigan, Southern Division, and elsewhere, ANGELA PATTON (D-1), SAM OSCAR PATTON (D-2), DONTEZ PATTON (D-3), JOHNATHON WESTON (D-4), CHARLIE SMITH (D-5), THOMAS TURNER, SR. (D-6), ARAMONA COLEMAN

(D-7), and TYNEKWA HILL (D-8) did knowingly transfer, possess, or use, without lawful authority, or aided and abetted others in transferring, possessing, or using without lawful authority, a means of identification of another person, to wit, names, social security numbers, dates of birth, addresses and other PII, with the intent to commit, or to aid or abet, or in connection with, any unlawful activity that constitutes a violation of Federal law, to wit, access device fraud in violation of 18 U.S.C. § 1029(a)(1), (b)(1), and (b)(2), the said means of identification was transported and used in a manner affecting interstate and foreign commerce.

40. All in violation of Title 18, United States Code, Sections 1028(a)(7) and (2).

**COUNT FOUR**

*(18 U.S.C. §§ 1028(a)(2) and 2 – Identity Theft, Aiding and Abetting)*

D-1 ANGELA PATTON  
D-2 SAM OSCAR PATTON  
D-3 DONTEZ PATTON  
D-4 JOHNATHON WESTON  
D-5 CHARLIE SMITH  
D-6 THOMAS TURNER, SR.  
D-7 ARAMONA COLEMAN  
D-8 TYNEKWA HILL

41. The allegations in paragraphs 1 through 33 are incorporated into this count by reference.
42. From in or about January 2012, and continuing through in or about December 2013, in the Eastern District of Michigan, Southern Division, and

elsewhere, ANGELA PATTON (D-1), SAM OSCAR PATTON (D-2), DONTEZ PATTON (D-3), JOHNATHON WESTON (D-4), CHARLIE SMITH (D-5), THOMAS TURNER, SR. (D-6), ARAMONA COLEMAN (D-7), and TYNEKWA HILL (D-8) did knowingly transfer, possess, or use, without lawful authority, or aided and abetted others in transferring, possessing, or using without lawful authority, false identification documents, or authentication features to wit, counterfeit driver's licenses, knowing that such documents or features were stolen or produced without lawful authority, the said false identification documents and authentication features were transported and used in a manner affecting interstate and foreign commerce.

43. All in violation of Title 18, United States Code, Sections 1028(a)(2) and (2).

**COUNT FIVE**  
*(18 U.S.C. §§ 1028A and 2 – Aggravated Identity Theft,  
Aiding and Abetting)*

D-1 ANGELA PATTON  
D-2 SAM OSCAR PATTON  
D-3 DONTEZ PATTON  
D-4 JOHNATHON WESTON  
D-5 CHARLIE SMITH  
D-6 THOMAS TURNER, SR.  
D-7 ARAMONA COLEMAN  
D-8 TYNEKWA HILL

44. The allegations in paragraphs 1 through 33 are incorporated into this count by reference.

45. From in or about January 2012, and continuing through in or about December 2013, in the Eastern District of Michigan, Southern Division, and elsewhere, ANGELA PATTON (D-1), SAM OSCAR PATTON (D-2), DONTEZ PATTON (D-3), JOHNATHON WESTON (D-4), CHARLIE SMITH (D-5), THOMAS TURNER, SR. (D-6), ARAMONA COLEMAN (D-7), and TYNEKWA HILL (D-8) knowingly and with the intent to defraud used, or aided and abetted others in using, without lawful authority, and in a manner affecting interstate commerce, a means of identification of another person, namely names, social security numbers, dates of birth, addresses, and other PII, belonging to unwitting victims, during and in relation to the felony violation of Identity Theft, 18 U.S.C. § 1028(a)(2), specified in Count Four of this Indictment.

46. All in violation of Title 18, United States Code, Sections 1028A and 2.

**COUNT SIX**

*(18 U.S.C. §§ 1343 and 2 – Wire Fraud, Aiding and Abetting)*

D-9 JEFFREY MORTON  
D-10 VERDELL KENNEDY  
D-11 RAYMOND THOMAS

47. The General Allegations contained in paragraphs 1 through 28 are incorporated into this count by reference.

48. From January 2013 to December 2014, those dates being approximate, in the Eastern District of Michigan, Southern Division and elsewhere, JEFFREY

MORTON (D-9), VERDELL KENNEDY (D-10), and RAYMOND THOMAS (D-11), devised and executed, and aided and abetted each other in devising and executing, a scheme or artifice to defraud and to obtain money and property by means of materially false and fraudulent pretenses, representations and promises. On or about the dates stated above, the defendants transmitted and caused to be transmitted by means of wire or radio communication in interstate or foreign commerce, writings, signs, signals, pictures or sounds, in furtherance of and to execute the scheme.

49. In furtherance of the scheme and to accomplish its goals, defendants MORTON, KENNEDY, and THOMAS used PII belonging to unwitting victims to either, establish new credit accounts, add themselves to existing credit accounts, or obtain replacement membership cards by claiming loss of previously issued cards at major stores such as Sam's Club and Cabela's. In each instance, they would use a fraudulent identification document in the name of a victim and the picture of one of the conspirators to obtain the store account card. Sam's cards were associated with credit accounts issued by GE Money Bank (n.k.a. Synchrony Financial) and Cabela's cards were associated with credit accounts issued by World's Foremost Bank. MORTON, KENNEDY, and THOMAS would then use the fraudulently obtained membership/credit cards to make large purchases at Sam's Club

warehouses and Cabela's stores in Michigan and elsewhere, including Atlanta, Georgia.

50. MORTON (D-9), KENNEDY (D-10), and THOMAS (D-11) worked together when they went to stores to execute their scheme. Typically, at least two of them would always be present at the same store to make fraudulent purchases or to open lines of credits in the names of unwitting victims.
51. To execute their scheme, MORTON, KENNEDY, and THOMAS used or caused the use of wire transmissions in interstate commerce. For example, each time the conspirators used the credit line associated with a fraudulent Sam's Club card or a fraudulent Cabela's credit card to purchase merchandise, in the course of completing the sale, the merchant would swipe the card on a merchant's terminal, transmitting signals by wire in interstate commerce to computers and representatives of GE Money Bank or World's Foremost Bank to obtain authorization for the sale. The credit card companies, located outside the State of Michigan would electronically verify that the credit number belonged to an actual account holder, and instantly transmit authorization back to the merchant, through wire in interstate commerce.

52. The amount of merchandise fraudulently obtained through this scheme by THOMAS, KENNEDY, and MORTON from Sam's Club alone exceeds \$742,000.
53. All in violation of Title 18, United States Code, Section 1343.

**COUNT SEVEN**

*(18 U.S.C. §§ 1029(a)(1) and 2 - Production, Use or Trafficking in Counterfeit Access Devices, Aiding and Abetting)*

D-9 JEFFREY MORTON  
D-10 VERDELL KENNEDY  
D-11 RAYMOND THOMAS

54. The allegations in paragraphs 1 through 28 and 48 through 52, above, are incorporated into this count by reference.
55. From in or about January 2013, and continuing through in or about December 2014, in the Eastern District of Michigan, Southern Division, and elsewhere, JEFFREY MORTON (D-9), VERDELL KENNEDY (D-10), and RAYMOND THOMAS (D-11), knowingly and with the intent to defraud produced, used or trafficked in, or aided and abetted others in producing, using or trafficking in, one or more counterfeit access devices, namely, Sam's Club membership and credit cards and Cabela's and other credit cards, and other PII, in a manner affecting interstate commerce.
56. All in violation of Title 18, United States Code, Sections 1029(a)(1) and 2.

**COUNT EIGHT**

*(18 U.S.C. §§ 1028(a)(1) and 2 - Identity Theft, Aiding and Abetting)*

D-9 JEFFREY MORTON  
D-10 VERDELL KENNEDY  
D-11 RAYMOND THOMAS

57. The allegations in paragraphs 1 through 28 and 48 through 52, above, are incorporated into this count by reference.
58. From in or about January 2013, and continuing through in or about December 2014, in the Eastern District of Michigan, Southern Division, JEFFREY MORTON (D-9), VERDELL KENNEDY (D-10), and RAYMOND THOMAS (D-11), did knowingly transfer, possess, or use, without lawful authority, or aided and abetted others in transferring, possessing, or using without lawful authority, false identification documents, or authentication features to wit, counterfeit driver's licenses, knowing that such documents or features were stolen or produced without lawful authority, the said false identification documents and authentication features were transported and used in a manner affecting interstate and foreign commerce.
59. All in violation of Title 18, United States Code, Sections 1028(a)(1) and (2).

**COUNT NINE**

*(18 U.S.C. §§ 1028A and 2, Aggravated Identity Theft,  
Aiding and Abetting)*

D-9 JEFFREY MORTON  
D-10 VERDELL KENNEDY  
D-11 RAYMOND THOMAS

60. The allegations in paragraphs 1 through 28 and 48 through 52, above, are incorporated into this count by reference.
61. From in or about January 2013, and continuing through in or about December 2014, in the Eastern District of Michigan, Southern Division, and elsewhere, JEFFREY MORTON (D-9), VERDELL KENNEDY (D-10), and RAYMOND THOMAS (D-11), knowingly and with the intent to defraud used, or aided and abetted others in using, without lawful authority, and in a manner affecting interstate commerce, a means of identification of another person, namely names, social security numbers, dates of birth, addresses, and other PII, belonging to unwitting victims, during and in relation to the felony violation of Access Device Fraud, 18 U.S.C. § 1029(a)(1), specified in Count Seven of this Indictment, and Identity Theft, 18 U.S.C. § 1028(a)(1), specified in Count Eight of this Indictment.
62. All in violation of Title 18, United States Code, Sections 1028A and 2.

**FORFEITURE ALLEGATIONS**

63. Pursuant to Fed.R.Cr.P. 32.2(a), the government hereby provides notice to the defendant of its intention to seek forfeiture of all proceeds, direct or indirect, or property traceable thereto; all property that facilitated the commission of the violations alleged, or property traceable thereto; and all property involved in, or property traceable thereto, of the violations set forth in this Indictment.

THIS IS A TRUE BILL.

*/s/ Foreperson of the Grand Jury*  
FOREPERSON OF THE GRAND JURY

BARBARA McQUADE  
United States Attorney

/s/ Abed Hammoud  
ABED HAMMOUD  
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/s/John K. Neal  
JOHN K. NEAL  
Assistant U.S. Attorney  
Chief, White Collar Crime Unit

Dated: February 19, 2015

United States District Court  
Eastern District of Michigan

**Criminal Case Co**

Case 2:15-cr-20094  
Judge: Battani, Marianne O.  
MJ: Stafford, Elizabeth A.  
Filed: 02-19-2015 At 03:58 PM  
INDI USA V. SEALED MATTER (DA)

NOTE: It is the responsibility of the Assistant U.S. Attorney signing this form to com.

**Reassignment/Recusal Information** This matter was opened in the USAO prior to August 15, 2008 [ ]

<b>Companion Case Information</b>		<b>Companion Case Number:</b>
This may be a companion case based upon LCrR 57.10 (b)(4) <sup>1</sup> :		Judge Assigned:
<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		AUSA's Initials: 

**Case Title:** USA v. ANGELA PATTON et al.

**County where offense occurred :** Wayne

**Check One:**  Felony       Misdemeanor       Petty

- Indictment/\_\_\_\_ Information --- no prior complaint.  
 Indictment/\_\_\_\_ Information --- based upon prior complaint [Case number: \_\_\_\_\_]  
 Indictment/\_\_\_\_ Information --- based upon LCrR 57.10 (d) [Complete Superseding section below].

**Superseding Case Information**

**Superseding to Case No:** \_\_\_\_\_ **Judge:** \_\_\_\_\_

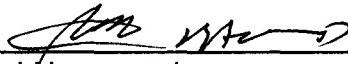
- Original case was terminated; no additional charges or defendants.  
 Corrects errors; no additional charges or defendants.  
 Involves, for plea purposes, different charges or adds counts.  
 Embraces same subject matter but adds the additional defendants or charges below:

<b><u>Defendant name</u></b>	<b><u>Charges</u></b>	<b><u>Prior Complaint (if applicable)</u></b>
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**Please take notice that the below listed Assistant United States Attorney is the attorney of record for the above captioned case.**

February 19, 2015

Date

  
 Abed Hammoud  
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 Attorney Bar #: P54908

<sup>1</sup> Companion cases are matters in which it appears that (1) substantially similar evidence will be offered at trial, (2) the same or related parties are present, and the cases arise out of the same transaction or occurrence. Cases may be companion cases even though one of them may have already been terminated.